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December 10, 2021

The Honorable Sarah Netburn
United States Magistrate Judge
Thurgood Marshall Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

I write regarding Your Honor's December 8, 2021 Order (ECF No. 7441) concerning motions for partial final judgments we filed (ECF Nos. 7329 and 7370). This letter relates to all cases that were the subject of those motions.

I unintentionally stated in the memoranda of law in support of those motions that there were plaintiffs being added pursuant to a Notice of Amendment filed contemporaneously with those motions, when in fact the plaintiffs identified in Exhibit C to my declarations in support of those motions were already added by Notice of Amendment. *See* ECF Nos. 7211, 7212, 7213, 7214, 7216, 7217, 7218, 7219, 7220, 7222, 7223, 7224, 7227, 7231, 7233. Attached hereto are updated Exhibits C for the motions previously filed (ECF Nos. 7329 and 7370) that contain the date and MDL docket number of the Notice of Amendment pursuant to which each plaintiff was added.

I apologize for any lack of clarity, and to avoid a future misunderstanding, from this point forward I will include in Exhibit C to our motions for partial final judgment the date and MDL docket number of the Notice of Amendment pursuant to which each plaintiff was added.

Respectfully submitted,

ANDERSON KILL P.C.

/s/ Jerry S. Goldman, Esq.
Jerry S. Goldman, Esq.
Attorney for Plaintiffs

Enclosure

Cc:
All Counsel of Record (via ECF)
The Honorable George B. Daniels (via ECF)

New York, NY ■ Los Angeles, CA ■ Stamford, CT ■ Washington, DC ■ Newark, NJ ■ Philadelphia, PA

UPDATED EXHIBITS C

**for FILING under
ECF No. 7329**

Ex. C-1

August Bernaerts, et al. v. Islamic Republic of Iran, No. 1:19-cv-11865 (GBD) (SN)

(Alphabetically by Last Name of 9/11 Decedent)

| | DECEDENT First Name | DECEDENT Middle Name | DECEDENT Last Name | PLAINTIFF First Name | PLAINTIFF Middle Name | PLAINTIFF Last Name | PLAINTIFF Suffix | Relationship to 9/11 Decedent | SOLATIUM DAMAGES AMOUNT | Notice of Amendment DATE FILED | Notice of Amendment MDL ECF No. |
|----|------------------------|----------------------------|-----------------------|-------------------------|--------------------------|------------------------|---------------------|-------------------------------------|----------------------------|--------------------------------------|---------------------------------------|
| 1. | Mary | Catherine | Boffa | Elizabeth | Anne | Murphy | | Sibling | \$4,250,000.00 | 10/7/2021 | 7224 |

TOTAL**\$4,250,000.00**

Ex. C-2

Ber Barry Aron, et al. v. Islamic Republic of Iran, No. 1:20-cv-09376 (GBD) (SN)

(Alphabetically by Last Name of 9/11 Decedent)

| | DECEDENT First Name | DECEDENT Middle Name | DECEDENT Last Name | PLAINTIFF First Name | PLAINTIFF Middle Name | PLAINTIFF Last Name | PLAINTIFF Suffix | Relationship to 9/11 Decedent | SOLATIUM DAMAGES AMOUNT | Notice of Amendment DATE FILED | Notice of Amendment MDL ECF No. |
|----|------------------------|----------------------------|-----------------------|-------------------------|--------------------------|------------------------|---------------------|-------------------------------------|----------------------------|--------------------------------------|---------------------------------------|
| 1. | Wendy | Ruth | Faulkner | Loren | Elisa | Smith | | Child | \$8,500,000.00 | 10/7/2021 | 7222 |
| 2. | Wendy | Ruth | Faulkner | Ashley | Elizabeth | Faulkner | | Child | \$8,500,000.00 | 10/7/2021 | 7222 |
| 3. | Wendy | Ruth | Faulkner | Lynn | Alan | Faulkner | | Spouse | \$12,500,000.00 | 10/7/2021 | 7222 |
| 4. | Paul | William | Innella | Victoria | Jacquelyn | Jones | | Child | \$8,500,000.00 | 10/7/2021 | 7222 |

TOTAL**\$38,000,000.00**

Ex. C-3

Jeanmarie Hargrave, et al. v. Islamic Republic of Iran, No. 1:20-cv-09387 (GBD) (SN)

(Alphabetically by Last Name of 9/11 Decedent)

| | DECEDENT First Name | DECEDENT Middle Name | DECEDENT Last Name | PLAINTIFF First Name | PLAINTIFF Middle Name | PLAINTIFF Last Name | PLAINTIFF Suffix | Relationship to 9/11 Decedent | SOLATIUM DAMAGES AMOUNT | Notice of Amendment DATE FILED | Notice of Amendment MDL ECF No. |
|----|------------------------|----------------------------|-----------------------|-------------------------|-----------------------------|------------------------|---------------------|-------------------------------------|----------------------------|--------------------------------------|--|
| 1. | Donald | Walter | Robertson | Matthew | John | Robertson | | Child | \$8,500,000.00 | 10/7/2021 | 7227 |
| 2. | Donald | Walter | Robertson | Michael | Ryan | Robertson | | Child | \$8,500,000.00 | 10/7/2021 | 7227 |
| 3. | Donald | Walter | Robertson | Madison | Erin | Robertson | | Child | \$8,500,000.00 | 10/7/2021 | 7227 |
| 4. | Donald | Walter | Robertson | Kevin | John | Robertson | | Child | \$8,500,000.00 | 10/7/2021 | 7227 |
| 5. | Donald | Walter | Robertson | John | Patrick | Robertson | | Sibling | \$4,250,000.00 | 10/7/2021 | 7227 |

TOTAL**\$38,250,000.00**

Ex. C-4

Paul Asaro, et al. v. Islamic Republic of Iran, No. 1:20-cv-10460 (GBD) (SN)

(Alphabetically by Last Name of 9/11 Decedent)

| | DECEDENT First Name | DECEDENT Middle Name | DECEDENT Last Name | PLAINTIFF First Name | PLAINTIFF Middle Name | PLAINTIFF Last Name | PLAINTIFF Suffix | Relationship to 9/11 Decedent | SOLATIUM DAMAGES AMOUNT | Notice of Amendment DATE FILED | Notice of Amendment MDL ECF No. |
|----|------------------------|----------------------------|-----------------------|-------------------------|--------------------------|------------------------|---------------------|-------------------------------------|----------------------------|--------------------------------------|---------------------------------------|
| 1. | Robert | David | Peraza | Suzanne | Joan | Peraza | | Parent | \$8,500,000.00 | 10/6/2021 | 7214 |

TOTAL**\$8,500,000.00**

UPDATED EXHIBITS C

**for FILING under
ECF No. 7370**

Ex. C-1

Jessica DeRubbio, et al. v. Islamic Republic of Iran, No. 1:18-cv-05306 (GBD) (SN)

(Alphabetically by Last Name of 9/11 Decedent)

| | DECEDENT First Name | DECEDENT Middle Name | DECEDENT Last Name | PLAINTIFF First Name | PLAINTIFF Middle Name | PLAINTIFF Last Name | PLAINTIFF Suffix | Relationship to 9/11 Decedent | SOLATIUM DAMAGES AMOUNT | Notice of Amendment DATE FILED | Notice of Amendment MDL ECF No. |
|--------------|------------------------|----------------------------|-----------------------|-------------------------|-----------------------------|------------------------|---------------------|-------------------------------------|----------------------------|--------------------------------------|--|
| 1. | Sadie | I. | Ette | Edu | | Umana | | Sibling | \$4,250,000.00 | 10/07/2021 | 7233 |
| 2. | Sadie | I. | Ette | Sunday | Itauma | Ette | | Parent (Deceased) | \$8,500,000.00 | 10/07/2021 | 7233 |
| 3. | Francis | Jude | Feely | Stephen | Joseph | Feely | | Sibling | \$4,250,000.00 | 10/07/2021 | 7233 |
| 4. | Francis | Jude | Feely | Alice | | Feely | | Sibling | \$4,250,000.00 | 10/07/2021 | 7233 |
| 5. | Jennifer | Lynn | Howley | Matthew | Franklin | Dorsey | | Sibling | \$4,250,000.00 | 10/07/2021 | 7233 |
| 6. | Maxima | | Jean-Pierre | Andy | Alberto | Jean-Pierre | | Child | \$8,500,000.00 | 10/07/2021 | 7233 |
| 7. | Maxima | | Jean-Pierre | Rachel | | Jean-Pierre | | Child | \$8,500,000.00 | 10/07/2021 | 7233 |
| 8. | Maxima | | Jean-Pierre | Anjunelly | | Jean-Pierre | | Child | \$8,500,000.00 | 10/07/2021 | 7233 |
| 9. | Maxima | | Jean-Pierre | Ajax | | Jean-Pierre | Jr. | Child | \$8,500,000.00 | 10/07/2021 | 7233 |
| TOTAL | | | | | | | | | \$59,500,000.00 | | |

Ex. C-2

Horace Morris, et al. v. Islamic Republic of Iran, No. 1:18-cv-05321 (GBD) (SN)

(Alphabetically by Last Name of 9/11 Decedent)

| | DECEDENT First Name | DECEDENT Middle Name | DECEDENT Last Name | PLAINTIFF First Name | PLAINTIFF Middle Name | PLAINTIFF Last Name | PLAINTIFF Suffix | Relationship to 9/11 Decedent | SOLATIUM DAMAGES AMOUNT | Notice of Amendment DATE FILED | Notice of Amendment MDL ECF No. |
|----|------------------------|----------------------------|-----------------------|-------------------------|-----------------------------|------------------------|---------------------|-------------------------------------|-------------------------------|--------------------------------------|--|
| 1. | Chin | Sun | Pak Wells | Chin | Yong | Wells | | Sibling | \$4,250,000.00 | 10/07/2021 | 7223 |
| 2. | Deborah | Ann | Ramsaur | Ernest | Louis | LaRoche | | Sibling | \$4,250,000.00 | 10/07/2021 | 7223 |
| 3. | Susan | Ann | Ruggiero | William | | Grigonis | | Sibling | \$4,250,000.00 | 10/07/2021 | 7223 |

TOTAL**\$12,750,000.00**

Ex. C-3

Audrey Ades, et al. v. Islamic Republic of Iran, No. 1:18-cv-07306 (GBD) (SN)

(Alphabetically by Last Name of 9/11 Decedent)

| | DECEDENT First Name | DECEDENT Middle Name | DECEDENT Last Name | PLAINTIFF First Name | PLAINTIFF Middle Name | PLAINTIFF Last Name | PLAINTIFF Suffix | Relationship to 9/11 Decedent | SOLATIUM DAMAGES AMOUNT | Notice of Amendment DATE FILED | Notice of Amendment MDL ECF No. |
|----|------------------------|----------------------------|-----------------------|-------------------------|--------------------------|------------------------|---------------------|-------------------------------------|-------------------------------|--------------------------------------|--|
| 1. | Patrick | Jude | Murphy | Casey | Akira | Murphy | | Child (Deceased) | \$8,500,000.00 | 10/06/2021 | 7213 |

TOTAL**\$8,500,000.00**

Ex. C-4

Lloyd A. Abel Sr., et al. v. Islamic Republic of Iran, No. 1:18-cv-11837 (GBD) (SN)

(Alphabetically by Last Name of 9/11 Decedent)

| | DECEDENT First Name | DECEDENT Middle Name | DECEDENT Last Name | PLAINTIFF First Name | PLAINTIFF Middle Name | PLAINTIFF Last Name | PLAINTIFF Suffix | Relationship to 9/11 Decedent | SOLATIUM DAMAGES AMOUNT | Notice of Amendment DATE FILED | Notice of Amendment ECF No. |
|----|------------------------|----------------------------|-----------------------|-------------------------|-----------------------------|------------------------|---------------------|-------------------------------------|-------------------------------|--------------------------------------|-----------------------------------|
| 1. | Michael | Sean | Curtin | Jennifer | | Sullivan | | Child | \$8,500,000.00 | 10/6/2021 | 7212 |

TOTAL**\$8,500,000.00**

Ex. C-5

Chang Don Kim, et al. v. Islamic Republic of Iran, No. 1:18-cv-11870 (GBD) (SN)

(Alphabetically by Last Name of 9/11 Decedent)

| | DECEDENT First Name | DECEDENT Middle Name | DECEDENT Last Name | PLAINTIFF First Name | PLAINTIFF Middle Name | PLAINTIFF Last Name | PLAINTIFF Suffix | Relationship to 9/11 Decedent | SOLATIUM DAMAGES AMOUNT | Notice of Amendment DATE FILED | Notice of Amendment MDL ECF No. |
|----|------------------------|----------------------------|-----------------------|-------------------------|-----------------------------|------------------------|---------------------|-------------------------------------|-------------------------------|--------------------------------------|--|
| 1. | Catherine | K. | Fagan | Christopher | | Fagan | | Child | \$8,500,000.00 | 10/06/2021 | 7218 |

TOTAL**\$8,500,000.00**

Ex. C-6

Alexander Jimenez, et al. v. Islamic Republic of Iran, No. 1:18-cv-11875 (GBD) (SN)

(Alphabetically by Last Name of 9/11 Decedent)

| | DECEDENT First Name | DECEDENT Middle Name | DECEDENT Last Name | PLAINTIFF First Name | PLAINTIFF Middle Name | PLAINTIFF Last Name | PLAINTIFF Suffix | Relationship to 9/11 Decedent | SOLATIUM DAMAGES AMOUNT | Notice of Amendment DATE FILED | Notice of Amendment MDL ECF No. |
|----|------------------------|----------------------------|-----------------------|-------------------------|-----------------------------|------------------------|---------------------|-------------------------------------|-------------------------------|--------------------------------------|---------------------------------------|
| 1. | Wesley | | Mercer | Garland | | Mercer | | Sibling | \$4,250,000.00 | 10/6/2021 | 7216 |

TOTAL**\$4,250,000.00**

Ex. C-7

Maureen Moody-Theinert, et al. v. Islamic Republic of Iran, No. 1:18-cv-11876 (GBD) (SN)

(Alphabetically by Last Name of 9/11 Decedent)

| | DECEDENT First Name | DECEDENT Middle Name | DECEDENT Last Name | PLAINTIFF First Name | PLAINTIFF Middle Name | PLAINTIFF Last Name | PLAINTIFF Suffix | Relationship to 9/11 Decedent | SOLATIUM DAMAGES AMOUNT | Notice of Amendment DATE FILED | Notice of Amendment MDL ECF No. |
|----|------------------------|----------------------------|-----------------------|-------------------------|-----------------------------|------------------------|---------------------|-------------------------------------|----------------------------|--------------------------------------|--|
| 1. | Gerard | Patrick | Moran | Joyce | Athena | Moran | | Spouse (Deceased) | \$12,500,000.00 | 10/6/2021 | 7220 |
| 2. | Gerard | Patrick | Moran | Dane | Michael | Moran | | Child (Deceased) | \$8,500,000.00 | 10/6/2021 | 7220 |

TOTAL**\$21,000,000.00**

Ex. C-8

Cheryl Rivelli, et al. v. Islamic Republic of Iran, No. 1:18-cv-11878 (GBD) (SN)

(Alphabetically by Last Name of 9/11 Decedent)

| | DECEDENT First Name | DECEDENT Middle Name | DECEDENT Last Name | PLAINTIFF First Name | PLAINTIFF Middle Name | PLAINTIFF Last Name | PLAINTIFF Suffix | Relationship to 9/11 Decedent | SOLATIUM DAMAGES AMOUNT | Notice of Amendment DATE FILED | Notice of Amendment MDL ECF No. |
|----|------------------------|----------------------------|-----------------------|-------------------------|--------------------------|------------------------|---------------------|-------------------------------------|-------------------------------|--------------------------------------|--|
| 1. | Dianne | Theresa | Signer | James | Matthew | Signer | | Sibling | \$4,250,000.00 | 10/6/2021 | 7217 |

TOTAL**\$4,250,000.00**

Ex. C-9

Gordon Aamoth, Sr., et al. v. Islamic Republic of Iran, No. 1:18-cv-12276 (GBD) (SN)

(Alphabetically by Last Name of 9/11 Decedent)

| | DECEDENT First Name | DECEDENT Middle Name | DECEDENT Last Name | PLAINTIFF First Name | PLAINTIFF Middle Name | PLAINTIFF Last Name | PLAINTIFF Suffix | Relationship to 9/11 Decedent | SOLATIUM DAMAGES AMOUNT | Notice of Amendment DATE FILED | Notice of Amendment MDL ECF No. |
|----|------------------------|----------------------------|-----------------------|-------------------------|--------------------------|------------------------|---------------------|-------------------------------------|----------------------------|--------------------------------------|---------------------------------------|
| 1. | Vivian | | Casalduc | Daniel | | Acevedo | | Sibling | \$4,250,000.00 | 10/6/2021 | 7211 |

TOTAL**\$4,250,000.00**

Ex. C-10

Marinella Hemenway, et al. v. Islamic Republic of Iran, No. 1:18-cv-12277 (GBD) (SN)

(Alphabetically by Last Name of 9/11 Decedent)

| | DECEDENT First Name | DECEDENT Middle Name | DECEDENT Last Name | PLAINTIFF First Name | PLAINTIFF Middle Name | PLAINTIFF Last Name | PLAINTIFF Suffix | Relationship to 9/11 Decedent | SOLATIUM DAMAGES AMOUNT | Notice of Amendment DATE FILED | Notice of Amendment MDL ECF No. |
|----|------------------------|----------------------------|-----------------------|-------------------------|-----------------------------|------------------------|---------------------|-------------------------------------|----------------------------|--------------------------------------|---------------------------------------|
| 1. | Ronald | John | Hemenway | Sheri | Lynn | Berger | | Sibling | \$4,250,000.00 | 10/7/2021 | 7231 |
| 2. | Laura | Marie | Ragonese-Snik | John | W. | Snik | | Spouse (Deceased) | \$12,500,000.00 | 10/7/2021 | 7231 |
| 3. | John | Frederick | Rhodes | Deborah | Ann | Malek | | Child | \$8,500,000.00 | 10/7/2021 | 7231 |
| 4. | John | Frederick | Rhodes | Linda | Patricia | Rhodes | | Spouse | \$12,500,000.00 | 10/7/2021 | 7231 |

TOTAL**\$37,750,000.00**

Ex. C-11

Matthew Rowenhorst, et al. v. Islamic Republic of Iran, No. 1:18-cv-12387 (GBD) (SN)

(Alphabetically by Last Name of 9/11 Decedent)

| | DECEDENT First Name | DECEDENT Middle Name | DECEDENT Last Name | PLAINTIFF First Name | PLAINTIFF Middle Name | PLAINTIFF Last Name | PLAINTIFF Suffix | Relationship to 9/11 Decedent | SOLATIU DAMAGES AMOUNT | Notice of Amendment DATE FILED | Notice of Amendment MDL ECF No. |
|----|------------------------|----------------------------|-----------------------|-------------------------|--------------------------|------------------------|---------------------|-------------------------------------|---------------------------|--------------------------------------|--|
| 1. | Leonard | Anthony | White | Nelson | Oscar | White | Jr. | Sibling | \$4,250,000.00 | 10/6/2021 | 7219 |
| 2. | Leonard | Anthony | White | Robert | Rawlston | White | | Sibling | \$4,250,000.00 | 10/6/2021 | 7219 |

TOTAL**\$8,500,000.00**